

Data Processing Agreement (DPA)

AJ.Fowler Properties Ltd

Company Registration Number: NI726202

Registered Office: 42 Low Road, Lisburn, BT27 4TJ

ICO Registration Number: ZC155708

Effective Date: 02/05/ 2025

1. Purpose

This Data Processing Agreement (“Agreement”) sets out the terms under which AJ.Fowler Properties Ltd processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Scope of Processing

The Company processes personal data including names, contact details, property information, identification documents, proof of funds, and payment data for the purpose of providing property sourcing and introduction services.

3. Systems & Sub-Processors

Personal data may be processed using the following systems:

- Podio – CRM and internal data control
- Make – Automation engine connecting systems
- PandaDoc – Electronic contract execution
- Stripe – Payment processing
- Microsoft Outlook – Email communication
- Twilio – WhatsApp communication
- SharePoint – Secure document storage and records management

These providers act as data processors and maintain their own security and compliance frameworks.

4. Lawful Basis

Processing is carried out under consent, contractual necessity, legitimate interests, and legal obligations (including anti-money laundering requirements).

5. Security Measures

The Company implements appropriate technical and organisational measures including access controls, encrypted communications, role-based permissions, and secure payment systems.

6. Data Subject Rights

The Company will assist data subjects in exercising their rights of access, rectification, erasure, restriction, portability, and objection where applicable.

7. Data Retention

Data is retained only as long as necessary for operational, legal, and regulatory purposes in accordance with our Privacy Policy.

8. International Transfers

Where data is processed outside the UK, appropriate safeguards such as standard contractual clauses or equivalent protections are implemented.

9. Termination

Upon termination of services, personal data will be securely deleted or retained only where legally required.

10. Data breach notification procedures

In accordance with Article 33 UK GDPR, where a personal data breach is likely to result in a risk to the rights and freedoms of individuals, AJ Fowler Properties Ltd shall notify the Information Commissioner's Office (ICO) without undue delay and, where required, within 72 hours of becoming aware of the breach.